

Merrill M. O'Brien, Esq.  
O'Brien Thornton LLC  
Attorneys for Creditor F3 Metalworx, Inc.  
160 Park Street  
Montclair, NJ 07042  
T: 973-886-8853  
F: 973-354-8029  
[obrien@obrienthornton.com](mailto:obrien@obrienthornton.com)

and

Joseph A. Anesta, Esq.  
Cameron & Mittleman LLP  
301 Promenade Street  
Providence, RI 02908  
T: 401-331-5700  
F: 401-331-5787  
[janesta@cm-law.com](mailto:janesta@cm-law.com)  
(Pending admission *pro hac vice*)  
Attorneys for Creditor F3 Metalworx, Inc.

UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY

---

In re:  
BED BATH & BEYOND INC., et al  
Debtors

---

Chapter 11  
Case No. 23-13359 (VFP)  
(Jointly Administered)

**NOTICE OF MOTION  
FOR ADMISSION *PRO HAC VICE*  
OF JUSTIN T. SHAY, ESQ.,  
AND JOSEPH A. ANESTA, ESQ.,  
OF CAMERON & MITTELMAN LLP**

TO: Kirkland & Ellis LLP  
Kirkland & Ellis International, LLP  
601 Lexington Avenue  
New York, NY 10022  
Joshua A. Sussberg, [joshua.sussberg@kirkland.com](mailto:joshua.sussberg@kirkland.com)  
Emily E. Geier, [emily.geier@kirkland.com](mailto:emily.geier@kirkland.com)  
Derek I. Hunter, [derek.hunter@kirkland.com](mailto:derek.hunter@kirkland.com)  
  
Cole Schotz P.C.  
Court Plaza North, 25 Main Street  
Hackensack, NJ 07601  
Michael D. Sirota, [msirota@coleschotz.com](mailto:msirota@coleschotz.com)

Warren A. Usatine, [wusatine@coleschotz.com](mailto:wusatine@coleschotz.com)  
Felice R. Yudkin, [fyudkin@coleschotz.com](mailto:fyudkin@coleschotz.com)

Office of the United States Trustee  
One Newark Center  
1085 Raymond Boulevard, Suite 2100  
Newark, NJ 07102  
<https://www.justice.gov/ust-regions-r03/region-3-district-new-jersey>

**PLEASE TAKE NOTICE**, that Creditor F3 Metalworx, Inc., by its attorneys O'Brien Thornton LLC, moves the admission *Pro Hac Vice* of Justin T. Shay, Esq., and Joseph A. Anesta, Esq., both of Cameron & Mittleman LLP, in this matter. No hearing date is required for this *Pro Hac Vice* application pursuant to the Rules of the Hon. Vincent F. Papalia. Movant invokes the Negative Notice Procedure set forth in paragraph B3(g) of the Case Management Procedures, Ex. 1 to the 4/25/2023 Case Management Order, and identifies 7/25/2023 at 10 a.m. as the date and time on which the two proposed Orders granting *Pro Hac Vice* admission will be entered, if objections are not filed and served on or before 7/18/2023. If objections are filed and served, movant requests a hearing.

Movant will rely upon the Declaration of Justin T. Shay, and the Declaration of Joseph A. Anesta, both signed 6/27/2023. No memorandum of law is filed in support of the motion because Mr. Shay's and Mr. Anesta's Declarations address all the criteria set forth in Fed.R.Civ.Proc. 78, D.N.J. L.Civ.R 101, and D.N.J.LBR 9010-1 for the Court's determination of the motion. Two proposed forms of Order are attached, one each for Mr. Shay's and Mr. Anesta's admissions.

O'Brien Thornton LLC  
Attorneys for Creditor F3 Metalworx, Inc.

Dated: June 29, 2023

s/Merrill O'Brien  
[obrien@obrienthornton.com](mailto:obrien@obrienthornton.com)  
160 Park Street  
Montclair, NJ 07042  
973-886-8853